

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Butler v Lehigh County,
et al

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PRAECIPE

To THE HONORABLE CLERK OF COURTS

Enclosed please file suit, forward correspondence to
all appropriate parties and return time-stamped
original to address noted below.

Very Respectfully Submitted,

Patrick S. Butler

Dated: January 4th 2022

Patrick S Butler
38 N 4th Street
Allentown PA 18102

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

Case No. _____

(to be filled in by the Clerk's Office)

Patrick Butler

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

LCS, City of Allentown, Kyle Russell
 Janine Donate, Michael Salter, Douglas
 Mette, Steven Miller, Tom Wolf, Lehigh County,
 see attached

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

The Clerk will not file a civil complaint unless the person seeking relief pays the entire filing fee (currently \$350) and an administrative fee (currently \$50) in advance, or the person applies for and is granted in forma pauperis status pursuant to 28 U.S.C. § 1915. A prisoner who seeks to proceed in forma pauperis must submit to the Clerk (1) a completed affidavit of poverty and (2) a copy of the trust fund account statement for the prisoner for the six month period immediately preceding the filing of the complaint, obtained from and certified as correct by the appropriate official of each prison at which the prisoner is or was confined for the preceding six months. See 28 U.S.C. § 1915(a)(2).

If the Judge enters an order granting a prisoner's application to proceed in forma pauperis, then the order will assess the filing fee (currently \$350) against the prisoner and collect the fee by directing the agency having custody of the prisoner to deduct an initial partial filing fee equal to 20% of the greater of the average monthly deposits to the prison account or the average monthly balance in the prison account for the six-month period immediately preceding the filing of the complaint, as well as monthly installment payments equal to 20% of the preceding month's income credited to the account for each month that the balance of the account exceeds \$10.00, until the entire filing fee has been paid. See 28 U.S.C. § 1915(b). A prisoner who is granted leave to proceed in forma pauperis is obligated to pay the entire filing fee regardless of the outcome of the proceeding, and is not entitled to the return of any payments made toward the fee.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Patrick Butler

All other names by which
you have been known:

ID Number

171922

Current Institution

Lehigh County Jail

Address

38 N 4th Street

Allentown

PA

18102

City

State

Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Lehigh County Jail

Job or Title (*if known*)

Shield Number

Employer

Address

38 N 4th Street

Allentown

PA

18102

City

State

Zip Code



Individual capacity



Official capacity

Defendant No. 2

Name

City of Allentown

Job or Title (*if known*)

Shield Number

Employer

Address

Allentown

PA

City

State

Zip Code



Individual capacity



Official capacity

Defendant No. 3

Name

Kyle Russell

Job or Title (if known)

Warden of LCT

Shield Number

Employer

Address

38 N 4th Street

Allentown

PA

18102

City

State

Zip Code



Individual capacity



Official capacity

Defendant No. 4

Name

Janine Donate

Job or Title (if known)

Director of LCT

Shield Number

Employer

Address

38 N 4th Street

Allentown

PA

18102

City

State

Zip Code



Individual capacity



Official capacity

See attached

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

Federal officials (a *Bivens* claim)

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

1st Amendment
Freedom from
Retaliation

RLUIPA

Common law breach of contract claim

14th Amendment

1st Amendment right to free exercise of Religion

Equal Protection

1st Amendment establishment clause

14th Amendment
Substantive Due Process

Municipal liability claim

Damages under RL

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

RLUIPA

Common law breach of contract claim

14th Amendment

1st Amendment right to free exercise of Religion

Equal Protection

1st Amendment establishment clause

14th Amendment
Substantive Due Process

Municipal liability claim

1st Amendment
Freedom from
Retaliation

Butler v. Lehigh
County, et al

EASTERN DISTRICT OF PENNSYLVANIA

Additional Defendants

- 5) Michael Salter Religious Manager for LCT X Individual
38 N 4th Street Allentown PA 18102 X Official
- 6) Douglas Mette Treatment Manager for LCT X Individual
38 N 4th Street Allentown PA 18102 X Official
- 7) Steven Miller Treatment Manager for LCT X Individual
38 N 4th Street Allentown PA 18102 X Official
- 8) Tom Wolf X Individual
Governor, Pennsylvania X Official
- 9) Lehigh County X Individual
Pennsylvania X Official
- 10) All housing unit officers working at LCT X Individual
carrying out the discrimination policy 2020-Present X Official
38 N 4th Street
Allentown PA 18102
- 11) The City Council of Allentown X Individual
whoever is in charge of the X Official
Director/Warden under Municipal liability

* All Defendants for All claims in Both
Individual & Official for § 1983 & Bivens

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

See attached

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

- ☒ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☐ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (*explain*) _____

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

/

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

See attached

Undisputed Facts Underlying Claims

During pretrial incarceration at LCT, I have been arbitrarily, prevented from going to Jumu'ah. I have exhausted administrative remedies (see attached) albeit been discouraged and threatened by numerous defendants. LCT allows Christian programming and other treatment classes during this time. (See Memorandum Posted November 1 2021 - Signed off and executed by all Defendants) (see volunteer visitor lists) Further, the LCT religious policy states religious activities are available. Jumu'ah is obligatory in my religion and not being able to attend violates my belief / is arbitrary, and no reason was ever given as to why other faiths are allowed to have programming. I have also been told to "stop" while I offer Salah by numerous defendants many times.

Also as per the LCT policy, I am not permitted to purchase a prayer rug from canteen but Ro Series are available for free - (see D-4 Religious Services / Articles LCT handbook)

I have requested numerous times to be able to offer Salah in the counselor room in order to at least have congregational prayer with other Muslim brothers but instead I am forced to pray 1 foot from a toilet 5 times a day every day but the brothers of Christian faith are allowed to use that room with outside volunteers who come in with guitars and literature of their respective faith. There also was an incident with a guard who, while I was in prostration during Salah, ordered me to take my underwear off. (See grievance records of LCT) I was retaliated against for filing a grievance for that incident. (Was told I would be put in the hole and forgotten about)

Additional grievances of all facts set forth herein should be in LCT file, however, I can provide the medical documentation records for injuries suffered as direct result of defendants actions. (Independent doctors as well)

C. What date and approximate time did the events giving rise to your claim(s) occur?

February 2020 - Present

November 2021 - Present

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

See attached

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Post traumatic stress disorder

Anxiety

Depression

Irreparable psychological damage

Intentional Infliction of Emotional Distress

I have medical records that show these injuries were sustained from the actions of all defendants

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Compensatory Damages \$50,000

Punitive Damages \$100,000

Attorney Fees & Costs

Immediate Reinstatement of Junyah

Appointment of Counsel

Change all Religious policies to fair and equal treatment of all faiths

From each defendant in individual & official

Summary Judgment

I assert the relief is warranted as defendants knowingly are acting in a malicious way. The old C.O. handbooks cover had Muslims hanging from a rope. If you tell officials during intake your Religion is Islam

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Lehigh County Jail

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes

☒ No

☐ Do not know

If yes, which claim(s)?

None / nothing was resolved / defendants willfully ignored all claims

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☒ No

- E. If you did file a grievance:

1. Where did you file the grievance?

Lehigh County Jail

2. What did you claim in your grievance?

See attached

3. What was the result, if any?

Suffered arbitrary retaliation and nothing was resolved

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

I completed the grievance policy as per the
 Lehigh County Jail Inmate Grievance Policies Chapter 42
 A, B, C, D, E, F, G. All claims violate LCJ's Religious
 Services / Articles Policies A, B, C, D

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

See attached

N/A - I filed grievances per LCJ policy, full exhausted

2. ^{remedies} If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

See attached

N/A -

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

See attached - Was threatened and discouraged throughout entire

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your process administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes

☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

N/A

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s)

N/A

Defendant(s)

N/A

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition.

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

E.D.Pa. AO Pro Se 14 (Rev. 04/18) Complaint for Violation of Civil Rights

☒ Yes☐ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) Patrick Butler

Defendant(s) David Pechinsben, Warden at MCP, Pastor Santos, County of Northampton

2. Court (if federal court, name the district; if state court, name the county and State)

3rd Circuit

3. Docket or index number

4. Name of Judge assigned to your case

Juan Sanchez

5. Approximate date of filing lawsuit

2018 - 2019

6. Is the case still pending?

☐ Yes

☒ No

If no, give the approximate date of disposition

June - July 2020

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

The defendants settled out of court
It ended in my favor

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Jan 4 2022

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address

Patrick S. Butler

Patrick Butler

171922

38 N 4th Street

Allentown

City

PA

State

18102

Zip Code

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address



Kyle A. Russell
Warden

**County Of Lehigh
Lehigh County Jail
38 North Fourth Street
Allentown, Pa 18102**

MEMORANDUM

TO: Inmate Butler, Patrick #171922

FROM: Kyle A. Russell, Warden

DATE: December 30, 2021

RE: Appeal of Grievance 21-0442

I am in receipt of your appeal. Your grievance was rejected because you failed to provide an event date and time. In addition, you failed to date your grievance form. You also failed to properly complete Part B of your grievance form.

I have reviewed your appeal statement and the original grievance information you provided. Your grievance was appropriately rejected.

Therefore, your appeal is denied.

cc: Grievance Coordinator
File

2A-36

INMATE FORMAL GRIEVANCE, PART I

STAFF USE ONLY

21-0442
GRIEVANCE #INMATE NAME: Patrick Butler INMATE #: 171922

INSTRUCTIONS:

1. See Policy 3.5.1.J., Inmate Grievances. Follow this policy.
2. In Block A state your grievance. Attach any relevant documents.
3. In Block B list what you did to resolve this issue prior to submitting this Formal Grievance.

A. Provide a brief, clear statement of the facts, what your grievance is, and what relief you are seeking. Include specific dates, times and staff involved. You must not exceed this space and one additional one-sided 8.5 x 11 piece of paper.

I am Muslim. I practice Islam. It is obligatory to attend Jum'ah congregational prayer each Friday. This is a sincerely held religious belief. I put a request to be able to attend. I was told by jail officials there are no Jum'ah prayers here. No reason given. During my time on 2A, the jail has had 2 outside volunteers come in to hold Christian based programming between the dates of November and December.

This is a clear violation of 1st Amendment - Establishment Clause, 14th Amendment Equal Protection Clause, Religious Land Use of Institutionalized Persons Act laws, Common law breach of contract, etc. This places a substantial burden on an adherent to substantially modify behavior and violate my beliefs. It is arbitrary and capricious.

I seek the immediate reinstatement of Jum'ah prayers to be held here as I am enduring intentional infliction of emotional harm among other damages.

Inmate signature/Date

Patrick S. Butler

B. List actions taken and staff you have contacted before submitting this grievance.

Wrote request slip
Spoke to staff
Spoke with attorneys
Spoke with outside religious leaders

Your Grievance has been received.

Grievance Coordinator signature:

Douglas Nett

Date:

12-14-21

3A-36

INMATE FORMAL GRIEVANCE, PART II

STAFF USE ONLY

260442
GRIEVANCE #INMATE NAME: DATRICK BOUTER INMATE #: 171922 DATE: 12-22-21C. Grievance is: ☐ Upheld ☐ Denied ☒ Rejected ☐ Other

D. Findings:

Per the Inmate Grievance Policy, your response is required for finding to proceed and about date and time. In addition, you failed to date your response form. You also failed to properly complete Part B of your Grievance form.

Investigating Staff signature: _____ Date: _____

Grievance Coordinator signature: Douglas Math Date: 12-22-21

E. Appeal: If appealing above decision, use Pink copy and send it to Warden. Provide the reason why you are appealing the above decision. Include all facts. You cannot exceed the space below and one additional one-sided 8-1/2" x 11" piece of paper. See Policy 3.5.1.J., Inmate Grievances, for more information.

I included the dates & places of the events. The 3rd Circuit will not dismiss this claim based on a fabricated technicality. I filled out part B perfectly. This jail has and continues to discriminate against myself and other Muslims and I will be seeking relief in the civil courts. You won't allow Imaniah but you allow Christian volunteers on duty in November & December 2021 there are records of this so they will be subpoenaed.

Patricia S. Buth

Inmate signature/Date

Dec 22
2021

DOC #4

INMATE'S REQUEST TO STAFF

Pedida de encarcelado a empleado

LEHIGH COUNTY

DEPARTMENT OF CORRECTIONS

TO (Name and Title of Officer)

PARA: (Nombre y Titulo)

MIKE SALTERS

DATE

(FECHA)

11/25

BY: (Inmate Name and ID Number)

DE: (Nombre y Numero)

PATRICK BUTLER

171922

QUARTERS ASSIGNMENT:

LOCAL DENTRO DE LA CARCEL:

IC

SUBJECT: State completely but briefly the problem on which you desire assistance. Give details.

ASUNTO: Describa completamente pero brevemente el problema con que desea asistencia. Incluya detalles.

I WOULD LIKE TO REQUEST QURAN
FORTRESS OF MUSLIM & BE PUT ON
JUMUAH LIST

DISPOSITION: (DO NOT WRITE IN THIS SPACE)

DISPOSICION: (NO ESCRIBA EN ESTE ESPACIO)

- Quran, Fortress of the Muslim attached.
- There are currently no Jumah classes.

STAFF MEMBER

EMPLEADO DE LA CARCEL

M/S

DATE

FECHA

12/22/21

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 38 N 4th Street Allentown PA 18102
 Address of Defendant: See attached
 Place of Accident, Incident or Transaction: 38 N 4th Street Allentown PA 18102

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when *Yes* is answered to any of the following questions:

- | | | |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: January 4 2022

Patricia S. Butch
 Must sign here
 Attorney-at-Law / Pro Se Plaintiff

Attorney I.D. # (if applicable)

CIVIL: (Place a ✓ in one category only)

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Patent
- ☐ 6. Labor-Management Relations
- ☒ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☐ 11. All other Federal Question Cases

(Please specify): _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☒ 6. Other Personal Injury (Please specify): _____
- ☐ 7. Products Liability
- ☐ 8. Products Liability - Asbestos
- ☐ 9. All other Diversity Cases

(Please specify): _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, _____, counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: January 4 2022

Patricia S. Butch
 Sign here if applicable
 Attorney-at-Law / Pro Se Plaintiff

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

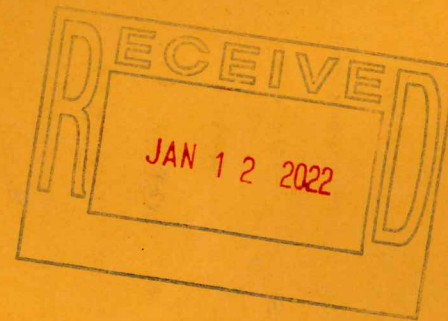
Patrick Butler 171922

LEHIGH COUNTY PRISON
38 NORTH 4th STREET
ALLENTOWN, PA 18102-3485



Lehigh Valley P&DC PA 180

MON 10 JAN 2022 AM



United States District Court
Eastern District of Pennsylvania
601 Market Street Room 2609
Philadelphia PA 19106-9865

LEGAL MAIL

LEGAL MAIL